



Industrial Telecommunications Association, Inc.

EX PARTE OR LATE FILED

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SEP 11 1996

September 10, 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: WT Docket No. 95-157;
Ex Parte Statement

Dear Mr. Caton:

I am transmitting an original and one copy of a written ex parte statement presented this date to Mr. David Furth, Commercial Wireless Division, Wireless Telecommunications Bureau, in the above-referenced proceeding.

Please place a copy of this statement in the official docket file for this proceeding.

Very truly yours,

Frederick J. Day
Frederick J. Day
Executive Director
Government Relations

Enclosure

cc: David Furth, Esq.
Sandra K. Danner, Esq.
Michael Hamra, Esq.

OH
Handwritten initials and a line.

TELFAC

Telephone Maintenance Frequency
Advisory Committee

CICS

Council of Independent
Communication Suppliers

Main Office: 1110 North Glebe Road • Suite 500 • Arlington, Virginia 22201 • (703) 528-5115 • FAX (703) 524-1074
Branch Office: 1270 Fairfield Road • Suite 33 • Gettysburg, Pennsylvania 17325 • (717) 334-0537 • FAX (717) 334-9602



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David Furth, Esq.
Chief, Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 7002
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: WT Docket No. 95-157; Ex Parte Statement

Dear Mr. Furth:

In its Petition for Partial Reconsideration filed on July 12, 1996 in the above-referenced proceeding, the Personal Communications Industry Association (PCIA) addressed the issue of the time frame within which PCS entities would have to file documentation of a relocation agreement with one of the designated relocation clearinghouses.

The rules adopted in the Commission's *First Report and Order* require the documentation to be filed within ten days after a relocation agreement is signed. PCIA urged the Commission to amend the rules to require filing of the documentation within twenty business days after the signing of the relocation agreement.

ITA believes the approach suggested by PCIA in its petition is preferable to the existing rule. As PCIA notes, extending the filing period will reduce the likelihood of disputes arising from errors or omissions in the documentation submitted. However, ITA would go even further than PCIA has suggested. ITA does not believe there is a need for the Commission to establish any specific time period for filing the agreement documentation.

The Commission's rules provide abundant incentive for PCS relocators to register with a clearinghouse promptly. Under the process outlined in the rules, a PCS relocater will not be able to obtain reimbursement from later-entrants until the relocater has registered with a clearinghouse. There is, therefore, a strong financial incentive for PCS relocators to register with a clearinghouse once they enter into relocation agreements. In short, ITA believes the process will compel registration. For this reason, ITA thinks it is unnecessary for the Commission to impose a specific time requirement on the registration process.

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David Furth, Esq.
September 10, 1996
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If you should have any questions regarding ITA's views on this issue, please do not hesitate to call us.

Very truly yours,

A handwritten signature in cursive script that reads "Ahmad Beyranvand".

Ahmad Beyranvand
Director, Clearinghouse Division

cc: Sandra K. Danner, Esq.
Michael Hamra, Esq.
Mr. William Caton